



John Troy <johntroy@troypllc.com>

Re: Xing v. Mayflower 18-cv-06616

1 message

Zuckerberg, Joshua <JZuckerberg@pryorcashman.com>
To: Troy Law <troylaw@troypllc.com>

Thu, Jul 18, 2019 at 8:04 F

Ok Aaron. Go for it. That's exactly what I said, we're "not participating in discovery." Have it your way. My request for an extension until Wednesday stands. Yes. I'm taking a 3 day weekend.

Sent from my iPhone, so please excuse brevity and typographical errors.

On Jul 18, 2019, at 7:05 PM, Troy Law <troylaw@troypllc.com><mailto:troylaw@troypllc.com>> wrote:

TROY LAW
Attorneys & Counselors at Law
Queens: 41-25 Kissena Blvd., Suite 119, Flushing, NY 11355 Tel: (718) 762-1324
Taipei: 11F, No. 372, Linsen N. Rd., Taipei City 10446, Taiwan Tel: +886-2-2571-2572

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----- Forwarded message -----

From: Troy Law <troylaw@troypllc.com><mailto:troylaw@troypllc.com>>
Date: Thu, Jul 18, 2019 at 7:03 PM
Subject: Re: Xing v. Mayflower 18 CV 6616
To: Zuckerberg, Joshua <JZuckerberg@pryorcashman.com><mailto:JZuckerberg@pryorcashman.com>>
Cc: Lucia Yang <lwyang@kktlawfirm.com><mailto:lwyang@kktlawfirm.com>>

Joshua,

What long weekend? It's not a public holiday, it's not a Jewish holiday, is this something personal you arranged for yourself?

It would have been good to know that at the outset, because while I can understand needing more time to process a big new file, I can't understand why I should delay pursuing a case so you can take a vacation from working on the case. I'm working on contingency here, and only get paid, if at all, at the end of this process.

You're not the only person at your firm, and Ms Wang and her firm have their own obligations. If I'm not going to be receiving anything by Friday, especially after attempting to accommodate you multiple times, I'll take that as a refusal to participate in discovery and inform the court.

Aaron

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On Thu, Jul 18, 2019 at 6:51 PM Zuckerberg, Joshua <JZuckerberg@pryorcashman.com><mailto:JZuckerberg@pryorcashman.com>> wrote:
Aaron- we're not going to have any responses ready by tomorrow and I'm away for a long weekend - returning on Tuesday- hence the Wednesday request

Sent from my iPhone, so please excuse brevity and typographical errors.

On Jul 18, 2019, at 6:43 PM, Troy Law <troylaw@troypllc.com><mailto:troylaw@troypllc.com>><mailto:troylaw@troypllc.com><mailto:troylaw@troypllc.com>>> wrote:

Joshua,

How about you provide what is ready by July 19, and provide the rest of the responses on a rolling basis (as they become ready) through July 25?

Aaron

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On Thu, Jul 18, 2019 at 5:57 PM Zuckerberg, Joshua <JZuckerberg@pryorcashman.com><mailto:JZuckerberg@pryorcashman.com>><mailto:JZuckerberg@pryorcashman.com><mailto:JZuckerberg@pryorcashman.com>>> wrote:
Aaron – I just realized you only gave us until Monday. That doesn't help us. We need until next Wednesday (7/25). We can certainly produce responses prior to that if they are ready, but 7/25 is the date that we can reasonably be done with that. If you cannot provide that accommodation let us know, and we'll take it to the Court.

Joshua Zuckerberg
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From: Zuckerberg, Joshua

Sent: Thursday, July 18, 2019 5:53 PM

To: 'Troy Law' <troylaw@troypilc.com<<mailto:troylaw@troypilc.com>><<mailto:troylaw@troypilc.com>><<mailto:troylaw@troypilc.com>>>>

Cc: Lucia Yang <lwyang@kktlawfirm.com<<mailto:lwyang@kktlawfirm.com>><<mailto:lwyang@kktlawfirm.com>><<mailto:lwyang@kktlawfirm.com>>>>

Subject: RE: Xing v. Mayflower 18 CV 6616

Thank you Aaron. To be clear, I'm not suggesting we are producing a 1,000 pages on July 22. I was saying that I have had to review all the previous papers, exhibits, and referenced cases in the last 2 weeks, which is about 1,000 pages. Anyway, you can be rest assured that Lucia and I will continue to comport ourselves to the highest ethical standards and be responding as promptly as possible. We appreciate the accommodation.

Joshua Zuckerberg

Partner

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From: Troy Law [<mailto:troylaw@troypilc.com><<mailto:troylaw@troypilc.com>>]

Sent: Thursday, July 18, 2019 5:48 PM

To: Zuckerberg, Joshua

<JZuckerberg@PRYORCASHMAN.com<<mailto:JZuckerberg@PRYORCASHMAN.com>><<mailto:JZuckerberg@PRYORCASHMAN.com>><<mailto:JZuckerberg@PRYORCASHMAN.com>>>>

Cc: Lucia Yang <lwyang@kktlawfirm.com<<mailto:lwyang@kktlawfirm.com>><<mailto:lwyang@kktlawfirm.com>><<mailto:lwyang@kktlawfirm.com>>>>

Subject: Re: Xing v. Mayflower 18 CV 6616

Joshua,

Professionalism is not mutually agreeing to an extension, and then coming back on the eve of the agreed-upon extended date to ask for more time without giving a reason. It is also contrary to what occurred during the collective action briefing - the filing of probative documents to the docket without having first produced them for inspection.

You were not responsible for that, but it seems to me that responsive documents are and have for some time been in the possession of defendants, and that the right thing to do would be to produce what they have and supplement according to the continuing discovery obligations should more documents come to light.

That being said, since you gave a specific, thousand-page reason in your last email why producing by Friday would be difficult, I'm willing to further extend until July 22.

Aaron

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On Thu, Jul 18, 2019 at 5:22 PM Zuckerberg, Joshua

<JZuckerberg@pryorcashman.com<<mailto:JZuckerberg@pryorcashman.com>><<mailto:JZuckerberg@pryorcashman.com>><<mailto:JZuckerberg@pryorcashman.com>>>> wrote:

Take advantage of what? I've had about a thousand pages of documents to go through in trying to get up to speed in this case, and I'm asking for a few days of additional time. And you're right, the opposition papers are due tomorrow, which is what we need to focus on right now, since that is a court-ordered deadline. This is a basic courtesy, and an accommodation I am certain you will need from us in the not-too-distant future. Are you going to make me go to the Court for this extension? I think you know who will come out looking poorly in that application. Let's try to maintain some basic professionalism.

Joshua Zuckerberg

Partner

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Sent: Thursday, July 18, 2019 5:17 PM

To: Zuckerberg, Joshua

<JZuckerberg@PRYORCASHMAN.com<<mailto:JZuckerberg@PRYORCASHMAN.com>><<mailto:JZuckerberg@PRYORCASHMAN.com>><<mailto:JZuckerberg@PRYORCASHMAN.com>>>>

Cc: Lucia Yang <lwyang@kktlawfirm.com<<mailto:lwyang@kktlawfirm.com>><<mailto:lwyang@kktlawfirm.com>><<mailto:lwyang@kktlawfirm.com>>>>

Subject: Re: Xing v. Mayflower 18 CV 6616

Joshua,

Discovery requests were served on June 5, and were originally due on July 5. We agreed to a two-week extension to July 19. July 19 is also the date your supplemental responses are due wrt the collective motion.

Please don't try to take advantage. Please try to keep the deadline you agreed to.

Aaron

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On Wed, Jul 17, 2019 at 11:49 AM Zuckerberg, Joshua

<JZuckerberg@pryorcashman.com<mailto:JZuckerberg@pryorcashman.com><mailto:JZuckerberg@pryorcashman.com<mailto:JZuckerberg@pryorcashman.com>>> wrote:
Aaron –

We're working on the discovery responses and responding to your recent submission. We'll need a few extra days on the discovery responses. Is next Wednesday (7/25) OK with you guys?

Joshua Zuckerberg
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